

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

R.S. BASSMAN, Derivatively on Behalf of
FREDDIE MAC a/k/a Federal Home Loan
Mortgage Corporation and its shareholders,

Plaintiff,

v.

RICHARD F. SYRON, et al.,

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan
Mortgage Corporation,

Nominal Defendant.

Case No. 08-cv-2423-BSJ-JCF

**NOTICE OF MOTION TO
CONSOLIDATE RELATED CASES
AND FOR ENTRY OF PROPOSED
CASE MANAGEMENT ORDER**

ESTHER SADOWSKY TESTAMENTARY
TRUST, Derivatively on Behalf of FREDDIE MAC
a/k/a Federal Home Loan Mortgage Corporation
and its shareholders,

Plaintiff,

v.

RICHARD F. SYRON, et al.,

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan
Mortgage Corporation,

Nominal Defendant.

Case No. 08-cv-5221-BSJ-JCF

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law

In Support of Plaintiff Bassman's Motion to Consolidate Related Cases and for Entry of

Proposed Case Management Order, the Declaration of Daniel P. Chiplock in support thereof, and the exhibits attached thereto, plaintiff R.S. Bassman will move this Court, before the Honorable James C. Francis IV, United States Magistrate Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for the entry of [Proposed] Pretrial Order No. 1 consolidating the above-captioned cases pursuant to Fed. R. Civ. P. 42(a), and appointing Lieff, Cabraser, Heimann & Bernstein, LLP (“Lieff Cabraser”), Greenfield & Goodman, LLC, and Cuneo, Gilbert & La Duca, LLP as co-lead counsel and Lieff Cabraser as liaison counsel for derivative plaintiffs in the consolidated action.

Dated: August 8, 2008

By: /s/ Daniel P. Chiplock
Daniel P. Chiplock

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